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12 *Special Counsel to Richard A. Marshack,*  
13 *Liquidation Trustee of the LPG Liquidation*  
14 *Trust*

15 UNITED STATES BANKRUPTCY COURT  
16  
17 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

18 In re

19 THE LITIGATION PRACTICE GROUP P.C.,

20 Debtor.

Case No: 8-23-bk-10571-SC

Chapter 11

DINSMORE AND SHOHL LLP'S NOTICE  
OF JOINDER AND JOINDER TO  
TRUSTEE'S REPLY IN SUPPORT OF  
FINAL APPLICATIONS FOR  
ALLOWANCE OF FEES AND COSTS;  
AND REQUEST FOR JUDICIAL NOTICE  
IN SUPPORT

Hearing:

Date: January 14, 2025

Time: 10:00 a.m.

Judge: Hon. Scott C. Clarkson

Place: Courtroom 5C - Via Zoom

411 W. Fourth Street

Santa Ana, CA 92701

1 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY  
2 JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, AND ALL INTERESTED  
3 PARTIES:

4 Notice is hereby given that Dinsmore and Shohl LLP ("Dinsmore"), hereby files this joinder  
5 ("Joinder") to the Trustee's Reply ("Reply")<sup>1</sup> in support of the final fee applications filed by the  
6 various Estate professionals (defined below as the "Fee Apps") to the "Objection of Greyson Law  
7 Center PC, Han Trinh & Jayde Trinh, to Court Granting Any of the Fee Applications Filed on or  
8 about 11/8/24, Itemized Herein, on a Final Basis—including Objecting to Court Granting Any Fee  
9 Applications, on a Final Basis, While Greyson/Han/Jayde Appeals Are Ongoing . . . Unless Money  
10 in the Full Amount of the Greyson/Han/Jayde Administrative Expense Motions Is Put in a Blocked  
11 Account, so that Money Will Be Available to Pay Whatever Amounts Are Allowed on  
12 Greyson/Han/Jayde's Appeals" filed as Docket No. 1972 ("Objection"), and Addendum to  
13 Objection filed as Docket No. 1992 ("Addendum"), by Greyson Law Center, PC; Han Trinh; and  
14 Jayde Trinh (collectively, "Objecting Parties").

15 The Objecting Parties do not object to any of the fees or costs incurred by Dinsmore or any  
16 of the other professionals in the Objection. Instead, the Objection focuses on an attempt to keep the  
17 allowed fees on an interim basis or require an escrow for the benefit of the Objecting Parties. The  
18 Trustee addresses these requests in his Reply, with Dinsmore joining the response. Additionally, the  
19 request for a reserve account for the Objecting Parties' "possible" administrative claim was already  
20 raised by these parties when they objected to the disclosure statement and plan. These arguments  
21 were addressed by the Court during the hearing. The Court noted that the Objecting Parties had  
22 remedies available, so that a reserve was not required. Nothing has changed since that conclusion.

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28 <sup>1</sup> All capitalized terms not otherwise defined in this Reply shall have the meaning ascribed to them in the Fee Apps.

1 Accordingly, Dinsmore requests that the Objection be overruled.

2 DATED: January 7, 2025

Dinsmore & Sholh, LLP

3

By: /s/ Yosina M. Lissebeck

4

Yosina M. Lissebeck

5

Christopher Celentino

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Special Counsel to Richard A. Marshack,  
Liquidation Trustee of the LPG Liquidation  
Trust

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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 655 W. Broadway, Suite 800, San Diego, California 92101

A true and correct copy of the foregoing document: **Dinsmore and Shohl LLP's Notice of Joinder and Joinder to Trustee's Reply in Support Of Final Applications For Allowance Of Fees And Costs; And Request For Judicial Notice In Support**

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On January 7, 2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On January 7, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

YCIR Inc.  
Hector Ocegueda  
535 S Barranca St #4  
Covina, CA 91723

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on January 7, 2025, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA FEDEX - JUDGE'S COPY**

The Honorable Scott C. Clarkson  
United States Bankruptcy Court  
Central District of California  
Ronald Reagan Federal Building and Courthouse  
411 West Fourth Street, Suite 5130 / Courtroom 5C  
Santa Ana, CA 92701-4593

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

January 7, 2025  
Date

Caron Burke  
Printed Name

/s/ Caron Burke  
Signature

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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D Edward Hays on behalf of Creditor Committee Committee of Unsecured Creditors

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